

US EPA ARCHIVE DOCUMENT



**ADDENDUM  
MIDLOTHIAN CUMULATIVE RISK ASSESSMENT**

Center for Combustion Science and Engineering  
Multimedia Planning and Permitting Division  
U.S. Environmental Protection Agency  
Region 6  
Dallas, TX 75202

October 31, 1997



In January 1996, the United States Environmental Protection Agency (USEPA) published the Midlothian Cumulative Risk Assessment (Midlothian Risk Assessment) that examined possible health risks associated with emissions from Chaparral Steel, North Texas Cement, Texas Industries, and Holnam Texas, L. P. The conclusion of the Midlothian Risk Assessment was that the available site data showed that potential health risk were below levels of regulatory concern. However, the report also stated that theoretical models indicated that there was a potential for noncancer health effects; primarily from antimony emissions associated with Chaparral Steel Company. Based on new data and revised calculations in this Addendum to the Midlothian Risk Assessment, the first conclusion originally stated in the report should be revised to read:

Neither available site data or conservative theoretical models show that there are cancer risks or the potential for non-cancer health effects above regulatory levels of concern.

The second original conclusion that theoretical potential health impacts above regulatory levels of concern are due to Chaparral Steel is no longer correct based on the change in the first conclusion. This change is warranted based on new data submitted by Chaparral Steel that predicts much lower emission rates for antimony than those originally estimated by EPA Region 6. As a part of the Midlothian Risk Assessment, the USEPA made theoretical calculations that indicated that antimony in electric arc furnace (EAF) dust from Chaparral Steel may be associated with noncancer health risk. This caused USEPA to look further at antimony concentrations in water and soil in the Midlothian area. As a result of further study, the USEPA concluded that actual soil and water concentrations were much lower than the concentrations predicted by the theoretical model.

In response to concerns identified by EPA in the Midlothian Risk Assessment, Chaparral Steel sampled and analyzed its emissions of antimony from the baghouses and determined antimony concentrations in EAF dust. In the Midlothian Risk Assessment, without the benefit of this site-specific data, the USEPA assumed a value for the concentration of antimony and calculated antimony emissions. Based on the new antimony data, USEPA has concluded that the antimony emission rate assumed in the Midlothian Risk Assessment for Chaparral Steel was too high. For this reason, the theoretical calculations concerning antimony are revised in this addendum.

When the theoretical risk calculations for antimony are revised based on actual antimony emissions and concentrations of antimony in EAF dust, the theoretical exposures from Chaparral Steel do not pose a potential impact to human health. This conclusion is consistent with that reached by USEPA with respect to the actual measured concentrations of antimony in soil and water.

## INTRODUCTION

The Midlothian Risk Assessment evaluates theoretical risks posed by releases of constituents from the Chaparral Steel, North Texas Cement, Texas Industries, and Holnam Texas, L. P. In the absence of specific information regarding concentrations of constituents in emissions from these facilities, the USEPA made assumptions in keeping with emissions profiles from similar facilities. The source of some of this information was a document entitled *Detailed Summary of Information Collection Request Responses For Electric Arc Furnace (EAF) NESHAP* (RTI, 1993). This document is referred to as the ICR in the Midlothian Risk Assessment.

Out of 77 steel facilities surveyed in the ICR, only one reported an antimony concentration in EAF dust. The antimony concentration in EAF dust from the single reporting steel facility was 0.52% or 5200 milligrams per kilogram (mg/kg) (or parts per million, ppm). Because antimony emissions and antimony concentrations in EAF dust from Chaparral Steel were not known prior to the publication of the Midlothian Risk Assessment, the antimony concentration from Chaparral Steel emissions was assumed to be the same as that found in EAF dust from the single facility reporting antimony emissions in the ICR (5200 ppm).

In addition, in its August 1988 report entitled "Best Demonstrated Available Technology (BDAT) Background Document for K061," USEPA found that the concentration range for antimony in EAF dust (K061) was 5.03 ppm to 294 ppm. These concentrations are also well below the 5200 ppm concentration assumed in the Midlothian Risk Assessment. EPA Region 6 chose the more conservative value of 5200 ppm because it felt that such conservatism was warranted given the overall lack of data about the processes used by Chaparral Steel.

In the Midlothian Risk Assessment, the USEPA acknowledged the uncertainty associated with estimation of emissions, indicating that: "The availability and quality of chemical-specific emission rates presented one of the largest sources of uncertainty associated with this screening level assessment." In the case of antimony, uncertainty regarding emission rates resulted in calculated theoretical noncancer risks that are considerably above what would be calculated using actual concentrations of antimony in air, water, and soil. This disparity was illustrated in Section 5 of the Midlothian Risk Assessment.<sup>1</sup>

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<sup>1</sup>For example, noncancer risks posed by ingestion of predicted concentrations of antimony in drinking water were 3. This value is slightly above the value of 1, indicating there may be a concern for potential noncancer effects. However, water samples collected from the Midlothian water supply by the Texas Natural Resource Conservation Commission (TNRCC) did not detect antimony at a concentration of 0.002 mg/L. If it is conservatively assumed that antimony is present at half the detection limit (0.001 mg/L), the calculated risk is 0.05, well below the risk calculated using the antimony concentrations predicted in the Midlothian Risk Assessment.

To lessen the uncertainty regarding antimony emissions and risks calculated using the ICR data, information regarding antimony emissions from Chaparral Steel baghouses and antimony concentrations in EAF dusts is used to re-calculate risks associated with theoretical human exposures to antimony in air, water, and soil. These data are discussed in detail below.

## OBJECTIVES

The objective of this addendum is to respond to information regarding antimony emissions from Chaparral Steel baghouses and antimony concentrations in EAF dusts submitted by Chaparral Steel after the Midlothian Cumulative Risk Assessment was finalized. This information slightly changes the conclusions of the report. The overall conclusion of the report—that cancer risks and the potential for noncancer health effects are below regulatory levels of concern—remain unchanged. The changes presented do not affect the EPA's decision about whether or not it should effect some regulatory action above and beyond that undertaken by Texas in the State permitting process.

## EVALUATION OF NEW DATA CONCERNING CONCENTRATIONS OF ANTIMONY IN FACILITY EMISSIONS

The best available information was used to estimate antimony emissions. These emission estimates have been used in recalculating risks. Fugitive emissions were calculated using total particulate fugitive emissions presented in the 1995 emissions inventory estimates for the "A" and "B" furnaces, together with the 95% upper confidence limit (95% UCL) of the arithmetic mean antimony concentration for Chaparral EAF dust. EAF dust antimony data used to calculate the 95% UCL are presented in Tables 1 and 2. Additional EAF data not used in these calculations are presented in Table 3<sup>2</sup>. The data from Tables 1 and 2 were subjected to quality assurance-quality control procedures. The 95% UCL antimony concentration calculated from these data was 84.0 ppm. This value was calculated in accordance

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<sup>2</sup> EAF dust antimony data presented in Table 1 are from six EAF dust samples obtained by Chaparral on January 28 through February 8, 1996. The laboratory reports for these analyses are attached to this addendum (Attachment B).

Data presented in Table 2 are the results of antimony analyses of three EAF dust samples obtained during the source emissions survey conducted by METCO Environmental in January and February 1996. During this survey, one sample of EAF dust was obtained from each of the "A," "B," and "C" baghouses. The laboratory reports for these analyses are attached to this addendum (Attachment C).

Table 3 presents the results of analyses performed in February 1996 of EAF dust digestate samples that had been retained as part of Chaparral's ongoing dust analysis program. At the request of Chaparral, Maxim Technologies, Inc. analyzed archived digestate samples for antimony. Since the request came after initial sample preparation, routine quality assurance/quality control (QA/QC) analyses could not be performed. These data do, however, provide an indication of the general range of antimony concentration found in Chaparral's EAF dust, and are consistent with data used for the 95% UCL calculations.

with USEPA guidance presented in Supplemental Guidance to RAGS: Calculating the Concentration Term (USEPA, 1992).

Stack antimony emissions for Baghouses B and C used in these revised risk calculations were measured by METCO Environmental (METCO) during stack sampling conducted as part of a source emissions survey in January-February 1996. Baghouse A antimony emissions were calculated using data also obtained by METCO for inlet flow rates for Baghouse A, Baghouse B stack flow rates, and actual measured Baghouse B antimony emissions. Stack emission rates for antimony are presented in Table 4.

The fugitive, stack, and total (i.e., fugitive + stack) antimony emissions values (in g/sec) obtained in the manner described above are lower than those used by Region 6 in their January 1996 Midlothian Risk Assessment report. A comparison of these emissions values is presented in Table 4.

A more detailed description of the basis for antimony emissions used in this revised risk assessment are presented below in Attachment A.

#### **REVISED RISK CALCULATIONS FOR ANTIMONY EXPOSURE**

Due to the disparity in the measured antimony emissions and antimony concentrations in EAF dust versus the concentration assumed in the Midlothian Risk Assessment, the risks posed by antimony exposure have been revised. With the exception of Chaparral Steel's antimony emissions, all exposure and risk assessment assumptions from the Midlothian Risk Assessment are used in the revised risk calculations. The revised risk assessment calculations resulting from the use of more certain estimates of antimony emissions and EAF concentrations from Chaparral Steel are presented in Table 5.

As presented in Table 5, the hazard indices re-calculated using the Chaparral Steel antimony data are below one. This indicates that the hypothetical adult resident, child resident, farmer, and fisherman in the SCS and Joe Pool Lake watersheds are not predicted to experience any adverse health effects as a result of exposure to modeled concentrations of antimony in air, water, and soil resulting from emissions from Chaparral Steel, North Texas Cement Company, Texas Industries, and Holnam Texas, L. P.

**According to the revised calculations presented in this addendum, the conclusions presented in Section 5 of the Midlothian Risk Assessment are revised to state that:**

**Neither available site data or conservative theoretical models show that there are cancer risks or the potential for non-cancer health effects above regulatory levels of concern.**

**REFERENCE**

**USEPA (United States Environmental Protection Agency) 1992. Supplemental Guidance to RAGS: Calculating the Concentration Term. Office of Solid Waste and Emergency Response. PB92-963373. May 1992.**

**Table 1**  
**Antimony Concentrations in Chaparral EAF Dust**  
**Sampled on January 28 - February 8, 1996**

Sample No.	Antimony (mg/kg)
01A	64.6
02A	68.0
03A	50.5
04A	54.0
05A	50.7
06A	81.9

**Table 2**  
**Antimony Concentrations in Chaparral EAF Dust**  
**Sampled by METCO in February, 1996**

Sample	Antimony (mg/kg)
Baghouse A	89.2
Baghouse B	55.7
Baghouse C	107.0

**Table 3**  
**Antimony Concentrations in Chaparral Steel EAF Dust**  
**Obtained from Archived Digestate Samples**

Sample No.	Antimony (mg/kg)
01A	59.1
02A	43.2
03A	<20
04A	44.2
05A	39.7
06A	29.9
07A	44.2
08A	34.6
09A	32.7
10A	33.3
11A	<20
12A	33.4
13A	69.8
14A	<20
15A	<20
16A	<20
17A	<20
18A	<20
19A	<20
20A	<20
21A	<20
22A	35.1
23A	33.5
24A	28.8
25A	30.9
26A	29.2
27A	30.5
28A	43.6
29A	47.5
30A	26.6
31A	43.8
32A	51.7

**Table 4**  
**Antimony Emissions for Chaparral Steel Company**

Emissions Source	Best Available Value (g/s)	Multimedia Risk Assessment Estimate (g/s)
Fugitives	0.000061	0.0098
Baghouse A	0.00021	0.0032
Baghouse B	0.00038	0.0081
Baghouse C	0.00038	0.0086
<b>Total</b>	<b>0.0010</b>	<b>0.030</b>

**Table 5**  
**Revised Risk Assessment Calculations for Antimony Exposures**

Receptor	Hazard Index for Receptor Points A1, B1, and C1		
	A1	B1	C1
Adult Resident	0.02 (3)	0.02 (3)	0.02 (3)
Child Resident	0.039 (6)	0.039 (6)	0.039 (6)
Farmer	0.02 (3)	0.02 (3)	0.026 (4)
Fisherman, SCS Lake Watershed	0.02 (3)	0.02 (3)	0.02 (3)
Fisherman, Joe Pool Lake Watershed	0.02 (3)	0.02 (3)	0.02 (3)

\* For comparison, the hazard index calculated in the January 31, 1996 USEPA risk assessment is shown in parenthesis

Attachment A  
Antimony Emissions Calculations for Chaparral Steel Company

**Attachment A**  
**Antimony Emissions Calculations for Chaparral Steel Company**

- 1) Total Antimony (Sb) emissions = total fugitive emissions + baghouse (BH) "A" emissions + BH "B" emissions + BH "C" emissions
- 2) Fugitive Sb Emissions
  - = furnace "A" fugitives + furnace "B" fugitives
  - = furnace "A" total particulates x EAF Sb conc. + furnace "B" total particulates x EAF Sb conc.
  - = 12.5 tpy<sup>1</sup> x %0.0084%\* + 12.5 tpy<sup>1</sup> x 0.0084%
  - = 0.0021 tons/yr Sb
  - = 0.000061 gm/s

\*NOTE: Upper 95% UCL Sb concentration for Chaparral EAF dust = 84.0 ppm
- 3) BH "A" Sb Emissions<sup>2</sup>
  - = BH "B" emissions x BH "A" Inlet flow/BH "B" stack flow
  - = 0.003 lbs/hr x 395,289 ACFM/679,559 ACFM
  - = 0.0017 lbs/hr
  - = 0.00021 gm/s
- 4) BH "B" Sb Emissions<sup>2</sup>
  - = 0.003 lbs/hr
  - = 0.00038 gm/s
- 5) BH "C" Sb Emissions<sup>2</sup>
  - = 0.003 lbs/hr
  - = 0.00038 gm/s
- 6) Total Sb Emissions
  - = 0.000061 + 0.00021 + 0.00038 + 0.00038 gm/s
  - = 0.001 gm/s

**References**

1. Revised Chaparral Steel Emissions Inventory for 1995.
2. METCO Environmental. Source Emissions Survey of Chaparral Steel Company, Midlothian.

**Texas, Volume 1. January and February, 1996.**



Attachment B  
Laboratory Report for Table 1 EAF Dust Analyses

# MAXIM

TECHNOLOGIES INC

2575 Lone Star Drive P.O. Box 224227 \* Dallas, Texas 75222 \* 214-631-2700

Client Jerry Balbo  
Chaparral Steel  
300 Ward Road  
Midlothian, TX 76065

Client No. 1544309  
Report No. D6-02-047  
Report Date 02/21/96 15:23

Project EAF Dust

Phone: 214-299-5212 Fax: 214-775-2382

Date Sampled 01/28/96 02/08/96

Sampled By Client \_\_\_\_\_

Sample Type Solid \_\_\_\_\_

Transported by Bob Garrett \_\_\_\_\_

P.O. # CT-145-96

Date Received 02/09/96

SPECIAL REPORT FOR ANTIMONY ONLY - REPORT FOR OTHER EAF DUST  
METALS RESULTS WILL FOLLOW WHEN COMPLETED.

Lab No.  
D6-02-047-01  
D6-02-047-02  
D6-02-047-03  
D6-02-047-04  
D6-02-047-05  
D6-02-047-06

Sample Identification  
RC 301625  
RC 301769  
RC 301646  
RC 301727  
RC 301762  
RC 301673

Our letters and reports are for the exclusive use of the  
client to whom they are addressed and shall not be reproduced  
except in full without the approval of the testing laboratory.  
The use of our name must receive our prior written approval.

MAXIM

Maurie Balbo  
Reviewed By

William J. Gase  
William J. Gase, Supervisor

Order # DG-02-047  
02/21/96 15:21  
Client: Chaparral Steel

TEST RESULTS BY SAMPLE

Page 2 of 3

Sample: 01A RC 301625

Collected: 01/28/96

Category: S

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Date</u>	<u>Limit</u>	<u>Started</u>	<u>Analyst</u>
Antimony	SW846-6010A	64.6	mg/kg		10	02/15/96	TAM
Cadmium Oxide	SW846-7130	0.0608	%		0.01	02/20/96	TAM
Calcium Oxide	SW846-7140	7.09	%		0.01	02/19/96	TAM
Digestion of Dust	SW846-3050A	02/14/96	Date Com				CWV
Iron Oxide	SW846-7380	40.0	%		0.01	02/20/96	TAM
Lead Oxide	SW846-7420	2.35	%		0.01	02/20/96	TAM
Loss on Ignition	EPA 160.4	3.8	%		0.01	02/17/96	MOL
Magnesium Oxide	SW846-7460	3.12	%		0.01	02/19/96	TAM
Zinc Oxide	SW846-7950	22.9	%		0.01	02/20/96	TAM

Sample: 02A RC 301769

Collected: 02/01/96

Category: S

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Date</u>	<u>Limit</u>	<u>Started</u>	<u>Analyst</u>
Antimony	SW846-6010A	68.0	mg/kg		10	02/15/96	TAM
Cadmium Oxide	SW846-7130	0.0683	%		0.01	02/20/96	TAM
Calcium Oxide	SW846-7140	5.67	%		0.01	02/19/96	TAM
Digestion of Dust	SW846-3050A	02/14/96	Date Com				CWV
Iron Oxide	SW846-7380	34.8	%		0.01	02/20/96	TAM
Lead Oxide	SW846-7420	3.21	%		0.01	02/20/96	TAM
Loss on Ignition	EPA 160.4	3.2	%		0.01	02/17/96	MOL
Magnesium Oxide	SW846-7460	2.89	%		0.01	02/19/96	TAM
Zinc Oxide	SW846-7950	29.4	%		0.01	02/20/96	TAM

Sample: 03A RC 301646

Collected: 02/03/96

Category: S

<u>Test Name</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Detection Date</u>	<u>Limit</u>	<u>Started</u>	<u>Analyst</u>
Antimony	SW846-6010A	50.5	mg/kg		10	02/15/96	TAM
Cadmium Oxide	SW846-7130	0.0625	%		0.01	02/20/96	TAM
Calcium Oxide	SW846-7140	4.94	%		0.01	02/19/96	TAM
Digestion of Dust	SW846-3050A	02/14/96	Date Com				CWV
Iron Oxide	SW846-7380	31.9	%		0.01	02/20/96	TAM
Lead Oxide	SW846-7420	2.44	%		0.01	02/20/96	TAM
Loss on Ignition	EPA 160.4	3.8	%		0.01	02/17/96	MOL
Magnesium Oxide	SW846-7460	2.71	%		0.01	02/19/96	TAM
Zinc Oxide	SW846-7950	32.4	%		0.01	02/20/96	TAM

Order # D6-02-047  
02/21/96 15:21  
Client: Chaparral Steel

TEST RESULTS BY SAMPLE

Page 3 of 3

Sample: 04A RC 301727

Collected: 02/06/96

Category: 5

Test Name

Antimony  
Cadmium Oxide  
Calcium Oxide  
Digestion of Dust  
Iron Oxide  
Lead Oxide  
Loss on Ignition  
Magnesium Oxide  
Zinc Oxide

Method	Result	Units
SW846-6010A	54.0	mg/kg
SW846-7130	0.0682	%
SW846-7140	4.10	%
SW846-3050A	02/14/96	Date Com
SW846-7380	34.7	%
SW846-7420	2.65	%
EPA 160.4	3.4	%
SW846-7460	2.05	%
SW846-7950	32.4	%

Detection Date

Limit	Started	Analyst
10	02/15/96	TAM
0.01	02/20/96	TAM
0.01	02/19/96	TAM
		CMP
0.01	02/20/96	TAM
0.01	02/20/96	TAM
0.01	02/17/96	HOU
0.01	02/19/96	TAM
0.01	02/20/96	TAM

Sample: 05A RC 301762

Collected: 02/06/96

Category: 5

Test Name

Antimony  
Cadmium Oxide  
Calcium Oxide  
Digestion of Dust  
Iron Oxide  
Lead Oxide  
Loss on Ignition  
Magnesium Oxide  
Zinc Oxide

Method	Result	Units
SW846-6010A	50.7	mg/kg
SW846-7130	0.0612	%
SW846-7140	3.67	%
SW846-3050A	02/14/96	Date Com
SW846-7380	27.9	%
SW846-7420	2.24	%
EPA 160.4	3.5	%
SW846-7460	2.23	%
SW846-7950	38.7	%

Detection Date

Limit	Started	Analyst
10	02/15/96	TAM
0.01	02/20/96	TAM
0.01	02/19/96	TAM
		CMP
0.01	02/20/96	TAM
0.01	02/20/96	TAM
0.01	02/17/96	HOU
0.01	02/19/96	TAM
0.01	02/20/96	TAM

Sample: 06A RC 301673

Collected: 02/08/96

Category: 5

Test Name

Antimony  
Cadmium Oxide  
Calcium Oxide  
Digestion of Dust  
Iron Oxide  
Lead Oxide  
Loss on Ignition  
Magnesium Oxide  
Zinc Oxide

Method	Result	Units
SW846-6010A	81.9	mg/kg
SW846-7130	0.0732	%
SW846-7140	4.14	%
SW846-3050A	02/14/96	Date Com
SW846-7380	34.1	%
SW846-7420	2.77	%
EPA 160.4	3.5	%
SW846-7460	2.24	%
SW846-7950	31.1	%

Detection Date

Limit	Started	Analyst
10	02/15/96	TAM
0.01	02/20/96	TAM
0.01	02/19/96	TAM
		CMP
0.01	02/20/96	TAM
0.01	02/20/96	TAM
0.01	02/17/96	HOU
0.01	02/19/96	TAM
0.01	02/20/96	TAM

**QUALITY ASSURANCE / QUALITY CONTROL TOTAL METALS**

Report No. D602047

<u>ANALYSIS</u>	<u>PARAMETER</u>	<u>RESULTS %</u>
Cal blank 1	Antimony	<0.1
Cal blank 2	Antimony	<0.1
Prep blank	Antimony	<0.1

<u>ANALYSIS</u>	<u>PARAMETER</u>	<u>RESULTS %</u>
ICV	Antimony	93
ICS 1	Antimony	89
CCV	Antimony	103
ICS 2	Antimony	102

<u>ANALYSIS</u>	<u>PARAMETER</u>	<u>RESULTS %</u>
TCC	Antimony	102
LCS	Antimony	105

ICV = Initial Calibration Verification + or - 10%  
 ICS = Interference Check Standard ICP daily + or - 20%  
 LCS = Laboratory Control Standard + or - 20% and + or - 30% silver and Antimony  
 TCC = Initial Calibration Check ICP ONLY + or - 5%  
 Blank = < Detection Limit RPD = Relative Percent Difference <20%

Attachment C  
Laboratory Report for METCO Baghouse Dust Samples (Table 5)



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**SOURCE EMISSIONS SURVEY  
OF  
CHAPARRAL STEEL COMPANY  
MIDLOTHIAN, TEXAS  
VOLUME II**

**JANUARY AND FEBRUARY 1996**

**FILE NUMBER 96-15**



44

Job # 96-155

Client Chaparral Steel

Location Midlothian, TX

UNIT Baghouse Dust  
DATE 2-16-96

Sample	Sb mg/Kg	As mg/Kg	Cd mg/Kg	Cr mg/Kg	Cu mg/Kg	Fe <sub>e</sub> mg/Kg	Pb mg/Kg	Mn mg/Kg	Hg mg/Kg	Mo mg/Kg	Ni mg/Kg	Zn mg/Kg
A Baghouse Dust	89.2	146	734	795	1,720	154,000	22,500	20,300	13.9	< 27.9	298	163,000
B Baghouse Dust	55.7	108	556	861	1530	133,000	18,200	19,500	15.4	48	287	128,000
C Baghouse Dust	107	134	735	1,710	2,700	213,000	28,100	24,800	1.4	33.5	172	228,000



Ross Analytical Services, Inc.  
16433 Foltz Industrial Parkway • Strongsville, Ohio 44136  
(216) 572-3200 • Fax (216) 572-7620 • 1-800-325-7737

CERTIFICATE OF ANALYSIS

t:

Environmental:  
Dooley Road  
s, TX 75244  
  
Hanoch Toren

Work Order #: 96-02-036  
Client Code: METCO  
Report Date: 02/15/96  
Work ID: Multi-metals Trains  
Date Received: 02/08/96

SAMPLE IDENTIFICATION

Sample Description	Lab Number	Sample Description
Composite B Baghouse Run 1	02	Composite B Baghouse Run 2
Composite B Baghouse Run 3	04	Composite B Baghouse Blank
Composite C Baghouse Run 1	06	Composite C Baghouse Run 2
Composite C Baghouse Run 3	08	Composite C Baghouse Blank
Audit Filter	10	A Baghouse Dust
B Baghouse Dust	12	C Baghouse Dust

Data are reported on an as-received basis unless stated otherwise. Estimated Quantitation Limits (EQL's) are listed for most analytes. EQL's are the lowest concentrations that can be reliably measured under routine laboratory conditions. Unless otherwise noted, method blanks had no targets found above their EQL's and results were not corrected for blanks.

  
Certificate approved by  
Peggy J. Schuler

000002



Ross Analytical Services, Inc.  
16433 Foltz Industrial Parkway • Strongsville, Ohio 44136  
(216) 572-3200 • Fax (216) 572-7620 • 1-800-325-7737

### CERTIFICATE OF ANALYSIS

ent:

co Environmental  
15 Dooley Road  
las, TX 75244

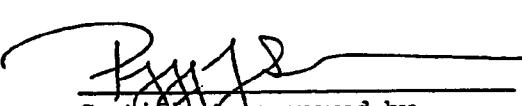
n: Hanoch Toren

Work Order #: 96-02-037  
Client Code: METCO  
Report Date: 02/15/96  
Work ID: Multi-metals Trains  
Date Received: 02/08/96

### SAMPLE IDENTIFICATION

Sample ber	Description	Lab Number	Sample Description
KMnO4 B	Baghouse Run 1	02	HCl B Baghouse Run 1
KMnO4 B	Baghouse Run 2	04	HCl B Baghouse Run 2
KMnO4 B	Baghouse Run 3	06	HCl B Baghouse Run 3
KMnO4 B	Baghouse Blank	08	HCl B Baghouse Blank
KMnO4 C	Baghouse Run 1	10	HCl C Baghouse Run 1
KMnO4 C	Baghouse Run 2	12	HCl C Baghouse Run 2
KMnO4 C	Baghouse Run 3	14	HCl C Baghouse Run 3
KMnO4 C	Baghouse Blank	16	HCl C Baghouse Blank

Data are reported on an as-received basis unless stated otherwise. Estimated Quantitation Limits (EQL's) are listed for most analytes. EQL's are the lowest concentrations that can be reliably measured under routine laboratory conditions. Unless otherwise noted, method blanks had no targets found above their EQL's and results were not corrected for blanks.

  
Certificate approved by  
Peggy J. Schuler

103

000004

Work Order # 96-02-036,037

Ross Analytical Services, Inc.

Reported: 02/15/96

/96

TEST METHODOLOGIES

Mercury was determined in aqueous samples and leachates by cold vapor atomic absorption after acid/permanganate digestion as in EPA Methods 245.1 and 7470A. A single analysis was performed unless otherwise noted.

"Multi-metals train" samples were prepared for analysis according to "Methodology for the Determination of Metals Emissions in Exhaust Gases from Hazardous Waste Incineration and Similar Combustion Processes", 40 CFR 266, Appendix IX, Section 3.1. Prepared samples were analyzed by Inductively Coupled Plasma Emission Spectroscopy (ICP) as in EPA Method 6010A, unless otherwise noted.

Metals were determined in solid and non-aqueous liquid samples by digestion with nitric acid, hydrogen peroxide, and hydrochloric acid as in EPA Method 3050A, followed by Inductively Coupled Plasma Emission Spectroscopy as in EPA Method 6010A, unless noted otherwise.

Mercury was determined in solid and non-aqueous liquid samples by cold vapor atomic absorption after acid/permanganate digestion as in EPA Methods 245.5 and 471A. A single analysis was performed unless otherwise noted.

Mercury was determined in aqueous samples and leachates by cold vapor atomic absorption after acid/permanganate digestion as in EPA Methods 245.1 and 7470A. A single analysis was performed unless otherwise noted.

**000005**

Work Order # 96-02-036

Ross Analytical Services, Inc

Reported: 02/15/96

Sample volume

<u>Job No.</u>	<u>Sample Description</u>	<u>Result</u>	<u>Units</u>	<u>EOI</u>
1D	HNO <sub>3</sub> FW B Baghouse Run 1	110	Total mL	5
1E	Imps. BH B Baghouse Run 1	463	Total mL	5
2D	HNO <sub>3</sub> FW B Baghouse Run 2	113	Total mL	5
2E	Imps. BH B Baghouse Run 2	455	Total mL	5
3D	HNO <sub>3</sub> FW B Baghouse Run 3	105	Total mL	5
3E	Imps. BH B Baghouse Run 3	445	Total mL	5
4D	HNO <sub>3</sub> FW B Baghouse Blank	110	Total mL	5
4E	Imps. BH B Baghouse Blank	295	Total mL	5
5D	HNO <sub>3</sub> FW C Baghouse Run 1	108	Total mL	5
5E	Imps. BH C Baghouse Run 1	445	Total mL	5
6D	HNO <sub>3</sub> FW C Baghouse Run 2	88	Total mL	5
6E	Imps. BH C Baghouse Run 2	445	Total mL	5
7D	HNO <sub>3</sub> FW C Baghouse Run 3	107	Total mL	5
7E	Imps. BH C Baghouse Run 3	480	Total mL	5
8D	HNO <sub>3</sub> FW C Baghouse Blk	95	Total mL	5
8E	Imps. BH C Baghouse Blank	390	Total mL	5

**000006**

Work Order # 96-02-037

Ross Analytical Services, Inc

Reported: 02/15/96

Sample volume

<u>b No.</u>	<u>Sample Description</u>	<u>Result</u>	<u>Units</u>	<u>EOL</u>
A	KMnO4 B Baghouse Run 1	187	Total mL	5
A	HCl B Baghouse Run 1	415	Total mL	5
A	KMnO4 B Baghouse Run 2	390	Total mL	5
A	HCl B Baghouse Run 2	225	Total mL	5
A	KMnO4 B Baghouse Run 3	387	Total mL	5
A	HCl B Baghouse Run 3	218	Total mL	5
A	KMnO4 B Baghouse Blank	385	Total mL	5
A	HCl B Baghouse Blank	220	Total mL	5
A	KMnO4 C Baghouse Run 1	385	Total mL	5
A	HCl C Baghouse Run 1	225	Total mL	5
A	KMnO4 C Baghouse Run 2	390	Total mL	5
A	HCl C Baghouse Run 2	240	Total mL	5
A	KMnO4 C Baghouse Run 3	400	Total mL	5
A	HCl C Baghouse Run 3	200	Total mL	5
A	KMnO4 C Baghouse Blank	380	Total mL	5
A	HCl C Baghouse Blank	222	Total mL	5

## COVER PAGE - INORGANIC ANALYSES DATA PACKAGE

Name: ROSS\_ANALYTICAL\_SERVICES\_ Contract: METCO\_\_\_\_\_

Code: ROSS\_ Case No.: \_\_\_\_\_ SAS No.: \_\_\_\_\_ SDG No.: BAGHOU

Lo.: ILM03

EPA Sample No.	Lab Sample ID
ABAGDUST	02-036-10A
ABAGDUSTD	02-036-10A-D
ABAGDUSTSD	02-036-10A-SD
ABAGDUSTS	02-036-10A-S
AUDIT	02-036-09A
BBAGBLK	02-036-04A
BBAGDUST	02-036-11A
BBAGR1	02-036-01A
BBAGR2	02-036-02A
BBAGR2D	02-036-02A-D
BBAGR2SD	02-036-02A-SD
BBAGR2S	02-036-02A-S
BBAGR3	02-036-03A
CBAGBLK	02-036-08A
CBAGDUST	02-036-12A
CBAGR1	02-036-05A
CBAGR2	02-036-06A
CBAGR2D	02-036-06A-D
CBAGR2SD	02-036-06A-SD
CBAGR2S	02-036-06A-S

ICP interelement corrections applied ?

Yes/No YES

ICP background corrections applied ?

Yes/No YES

If yes - were raw data generated before  
application of background corrections ?

Yes/No NO

Comments:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

I certify that this data package is in compliance with the terms and conditions of the contract, both technically and for completeness, for purposes other than the conditions detailed above. Release of the data contained in this hardcopy data package and in the computer-readable data submitted on 3.5" floppy diskette has been authorized by the Laboratory Manager or the owner's designee, as verified by the following signature.

Date: Peggy J. Schuler  
01/15/96

Name: Peggy J. Schuler  
 Title: Quality Control Chemist

U.S. EPA - CLP

000019

1  
**INORGANIC ANALYSES DATA SHEET**

EPA SAMPLE NO.

Name: ROSS ANALYTICAL SERVICES Contract: METCO ABAGDUSI  
Code: ROSS Case No.: SAS No.: SDG No.: BAGHOU  
Fix (soil/water): SOIL Lab Sample ID: 02-036-10A  
L (low/med): LOW Date Received: 02/08/96  
Lids: 100.0

Concentration Units (ug/L or mg/kg dry weight): MG/KG

: Before: \_\_\_\_\_  
: After: \_\_\_\_\_

**Clarity Before:** \_\_\_\_\_  
**Clarity After:** \_\_\_\_\_

Texture: \_\_\_\_\_  
Artifacts: \_\_\_\_\_

3nts;

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**E-40**

000021

U.S. EPA - CLP

**INORGANIC ANALYSES DATA SHEET**

ETP SAMPLE NO.

Name: ROSS ANALYTICAL SERVICES Contract: METCO \_\_\_\_\_  
Code: ROSS Case No.: \_\_\_\_\_ SAS No.: \_\_\_\_\_ SDG No.: BAGHOU  
x (soil/water): SOIL \_\_\_\_\_ Lab Sample ID: 02-036-12A  
(low/med): LOW \_\_\_\_\_ Date Received: 02/08/96  
ids: 100.0

Concentration Units (ug/L or mg/kg dry weight): MG/KG

Before: \_\_\_\_\_  
 After: \_\_\_\_\_

**Clarity Before:** \_\_\_\_\_  
**Clarity After:** \_\_\_\_\_

**Texture:** \_\_\_\_\_  
**Artifacts:** \_\_\_\_\_

ants:

**FORM T - TN**

ILM02.1

**2A**  
**INITIAL AND CONTINUING CALIBRATION VERIFICATION**

Name: ROSS ANALYTICAL SERVICES

Contract: METCO

Code: ROSS

**Case No.:** \_\_\_\_\_

**SAS No. :**

**SDG No. : EAGHOU**

al Calibration Source:

PLASMA CHEM

ning Calibration Source: PLASMA CHEM

Concentration Units: ug/L

Control Limits: Mercury 80-120; Other Metals 90-110; Cyanide 85-115

**FORM II (PART 1) - IN**

ILM02.1

2A  
INITIAL AND CONTINUING CALIBRATION VERIFICATION

Name: ROSS ANALYTICAL SERVICES

Contract: METCO

Mode: ROSS

Case No.:

SAS No.:

SDG No.: BAGHOU

Initial Calibration Source: PLASMA CHEM

Continuing Calibration Source: PLASMA CHEM

Concentration Units: ug/L

Element	Initial Calibration			Continuing Calibration				Method
	True	Found	%R(1)	True	Found	%R(1)	Found	
Chromium				10000.0	10237.21	102.4		NR
Molybdenum				10000.0	9963.17	99.6	9512.26	P
Nickel								NR
Iron								NR
Lead								NR
Copper				1000.0	994.67	99.5		P
Sulfur								NR
Phosphorus								P
Antimony				2000.0	2009.29	100.5		NR
Vanadium								NR
Iron				2000.0	1979.97	99.0		P
Mercury				20000.0	20714.26	103.6		P
Lead				10000.0	9889.37	98.9		NR
Chromium								NR
Vanadium								NR
Iron								NR
Mercury	2.0	2.10	105.0	1000.0	984.00	98.4	5.31	CV
Lead					5.0	5.17	103.4	P
Chromium				2000.0	2053.87	102.7		P
Iron				2000.0	1998.19	99.9		NR
Mercury								NR
Lead								NR
Chromium								NR
Iron								NR
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Lead</td								

2A  
INITIAL AND CONTINUING CALIBRATION VERIFICATION

Name: ROSS ANALYTICAL SERVICES

**Contract: METCO**

Code: ROSS

**Case No.:** \_\_\_\_\_

SAS No.: \_\_\_\_\_

**SDG No.: BAGHOUT**

### **al Calibration Source:**

PLASMA CHEM

ning Calibration Source: PLASMA CHEM

**Concentration Units:** ug/L

Control Limits: Mercury 80-120; Other Metals 90-110; Cyanide 85-115

**FORM II (PART 1) - IN**

ILM02.1

000045

U.S. EPA - CLP

2B

Name : ROSS\_ANALYTICAL\_SERVICES\_

**Contract : METCO** \_\_\_\_\_

BOT

Code: ROSS Case No.: \_\_\_\_\_

SAS No.: \_\_\_\_\_

**SDG No. : BAGHOU**

RDL Standard Source: \_\_\_\_\_

CRDL Standard Source: SOLUTIONS PL

**Concentration Units: ug/L**

Element	CRDL Standard for AA			CRDL Standard for ICP		
	True	Found	%R	Initial	Found	%R
minum				200.0	213.32	106.7
imony						
enic						
ium						
yllium						
muth				10.0	12.23	122.3
mium						
cium				20.0	20.15	100.8
omium						
alt				40.0	40.46	101.2
per						
n				200.0	264.35	132.2
d				100.0	90.30	90.3
hium						
nesium						
ganese						
cury				10.0	13.98	139.8
ybdenu						
kel				20.0	14.39	72.0
assium				40.0	41.91	104.8
enium						
ver						
ium						
llium						
adium						
c						

**FORM II (PART 2) - IN**

ILM02.1

U.S. EPA - CLP

000046

2B  
CRDL STANDARD FOR AA AND ICP

Name: ROSS ANALYTICAL SERVICES

**Contract: METCO**

Code: ROSS \_\_\_\_\_ Case No.: \_\_\_\_\_

SAS No.: SDG No.: BAGHULI

## RDL Standard Source:

CRDL Standard Source: SOLUTIONS PL

**Concentration Units:** ug/L

**FORM II (PART 2) - IN**

ILM02.1

000047

U.S. EPA - CLP

2B  
CRDL STANDARD FOR AA AND ICP

Name: ROSS\_ANALYTICAL\_SERVICES\_  
Code: ROSS\_ Case No.: \_\_\_\_\_  
RDL Standard Source: \_\_\_\_\_  
RDL Standard Source: SOLUTIONS PL

**Contract:** METCO

SAS No.: \_\_\_\_\_ SDG No.: BAGHOU

**Concentration Units: ug/L**

**FORM II (PART 2) - IN**

ILM02.1

000048

**3  
BLANKS**

ame: ROSS ANALYTICAL SERVICES

**Contract:** METCO

Code: ROSS

**Case No.:**

SAC No.

**SDG No. : BAGHOT**

ation Blank Matrix (soil/water). corr.

Reaction Blank Concentration Units ( $\mu\text{g/L}$  or  $\text{mg/L}$ )  $\mu\text{g/L}$

677  
2/15/94

**FORM III - IN**

ILM02.1

U.S. EPA - CLP

000049

3  
BLANKS

Name: ROSS ANALYTICAL SERVICES Contract: METCO

Code: ROSS Case No.:                  SAS No.:                  SDG No.: BAGHONI

ration Blank Matrix (soil/water): WATER

ration Blank Concentration Units (ug/L or mg/kg) : UG/L

Com 2115/96

**FORM III - IN**

ILM02.L

U.S. EPA - CLP

3  
BLANKS

Name: ROSS ANALYTICAL SERVICES Contract: METCO

Contract: METCO

**Code: ROSS** \_\_\_\_\_ **Case No.:** \_\_\_\_\_ **SAS No.:** \_\_\_\_\_ **SDG No.:** **BAGHOUT**

Case No.: \_\_\_\_\_

SAS No.:

SDG No.: BAG3001

Preparation Blank Matrix (soil/water): WATER

aration Blank Concentration Units (ug/L or mg/kg): UG/L

Conn 2/14/96

**FORM III - IN**

ILM02.1

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U.S. EPA - CLP

4

ne: ROSS\_ANALYTICAL\_SERVICES\_ Contract: METCO \_\_\_\_\_  
de: ROSS\_ Case No.: \_\_\_\_\_ SAS No: \_\_\_\_\_ SDG No.: BAGHOU  
Number: TJA 36 \_\_\_\_\_ ICS Source: CPI \_\_\_\_\_

Concentration Units: ug/L

**FORM IV - IN**

. ILMQ2.1

U.S. EPA - CLP

000061

**SA**  
**SPIKE SAMPLE RECOVERY**

EPA SAMPLE NO.

Name: ROSS ANALYTICAL SERVICES Contract: METCO ABAGDUSTS  
Code: ROSS Case No.: SAS No.: SDG No.: BAGHOU  
x: SOIL Level (low/med): LOW  
ids for Sample: 100.0

Concentration Units (ug/L or mg/kg dry weight) : MG/KG

ts:

**FORM V (Part 1) - IN**

ILM02.1

U.S. EPA - CLP

000062

**5A**  
**SPIKE SAMPLE RECOVERY**

EPA SAMPLE NO.

Name: ROSS\_ANALYTICAL\_SERVICES\_ Contract:METCO ABAGDUSTSD  
Code: ROSS Case No.: SAS No.: SDG No.: BAGHOU  
ix: SOIL Level (low/med): LOW  
Lids for Sample: 100.0

Concentration Units (ug/L or mg/kg dry weight): MG/KG

179

**FORM V (Part 1) - IN**

JLM03 1

U.S. EPA - CLP

5B  
POST DIGEST SPIKE SAMPLE RECOVERY

EPA SAMPLE NO. \_\_\_\_\_

Name: ROSS\_ANALYTICAL\_SERVICES\_ Contract: METCO \_\_\_\_\_ ABAGDUSTA  
Code: ROSS\_ Case No.: \_\_\_\_\_ SAS No.: \_\_\_\_\_ SDG No.: BAGHOU  
ix: SOIL \_\_\_\_\_ Level (low/med): LOW \_\_\_\_\_

Concentration Units: ug/L

ents:

2.1

000076

U.S. EPA - CLP

**5B**  
**POST DIGEST SPIKE SAMPLE RECOVERY**

EPA SAMPLE NO.

Name: ROSS ANALYTICAL SERVICES Contract: METCO ABAGDUSTAD  
Code: ROSS Case No.: SAS No.: SDG No.: BAGHOU  
x: SOIL Level (low/med): LOW

**Level (low/med) :** LOW

**Concentration Units:** ug/L

nts:

2.1

000079

U.S. EPA - CLP

**DUPPLICATES**

EPA SAMPLE NO.

Name: ROSS ANALYTICAL SERVICES Contract: METCO

**Contract:** METCO

ABAGDUSTD

Code: ROSS \_\_\_\_\_ Case No.: \_\_\_\_\_ SAS No.: \_\_\_\_\_

Case No.:

SAS No. :

SDG No.: BACI007

ix (soil/water) : SOIL

Level (low/med): LOW

lids for Sample: 100.0

\* Solids for Duplicate: 100.0

Concentration Units (ug/L or mg/kg dry weight): MG/KG

**FORM VI - IN**

LLM02\_1

U.S. EPA - CLP

000088

SPIKE DUPLICATES 6

EPA SAMPLE NO. \_\_\_\_\_

Name: ROSS ANALYTICAL SERVICES Contract: METCO

**Contract: METCO**

ABAGDUSTSD

Code: ROSS Case No.: \_\_\_\_\_

SAS No.: \_\_\_\_\_

SDG No.: BAGHOU

ix (soil/water): SOIL\_

Level (low/med) = LOW

Lids for Sample: 100.0

\* Solids for Duplicate: \_100.0

Concentration Units (ug/L or mg/kg dry weight): MG/KG

**FORM VI - IN**

ILM02.1

U.S. EPA - CLP

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POST SPIKE DUPLICATES<sup>6</sup>

EPA SAMPLE NO.

Name: ROSS ANALYTICAL SERVICES Contract: METCO

Contract: METCC

ABAGDUSTAD

Code: ROSS\_ Case No.: \_\_\_\_ SAS No.: \_\_\_\_ SDG No.: BAGHOU  
ix (soil/water): SOIL\_ Level (low/med): \_LOW\_  
lids for Sample: 100.0 \* Solids for Duplicate: \_100.0

Concentration Units (ug/L or mg/kg dry weight) : MG/KG

**FORM VI - IN**

ILM02.1

U.S. EPA - CLP

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7  
LABORATORY CONTROL SAMPLE

ame: ROSS\_ANALYTICAL\_SERVICES\_

**Contract: METCO**

Code: ROSS \_\_\_\_\_ Case No.: \_\_\_\_\_

**SAS No.:** \_\_\_\_\_ **SDG No.:** BAGHOU

LCS Source: ERA

us LCS Source: SOLUTIONS PL

**FORM VII - IN**

ILM02.1

U.S. EPA - CLP

000095

7  
LABORATORY CONTROL SAMPLE

Name: ROSS\_ANALYTICAL\_SERVICES

**Contract: METCO**

Code: ROSS Case No.:

SAS No.: SDG No. - BAGCHIT

d LCS Source:

ous LCS Source: SOLUTIONS PL

**FORM VII - IN**

ILM02.1

U.S. EPA - CLP

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10

### Instrument Detection Limits (Quarterly)

Contract: METCO \_\_\_\_\_  
SAS No.: SDG No.: BAGHOU  
Date: 01/03/96

15

**FORM X - IN**

JM02-1

U.S. EPA - CLP

10  
Instrument Detection Limits (Quarterly)

Name: ROSS ANALYTICAL SERVICES  
Code: ROSS Case No.: \_\_\_\_\_  
ID Number:  
ne AA ID Number : LEEMAN\_PS200  
lace AA ID Number :

Contract: METCO \_\_\_\_\_  
SAS No.: SDG No.: BAGHOU  
Date: 12/16/95

B7g.i

**FORM X - IN**

ILM02.1

000001



Ross Analytical Services, Inc.  
16433 Folk Industrial Parkway - Strongsville, Ohio 44136  
(216) 512-3200 • Fax: (216) 512-7620 • 1-800-325-7232

CERTIFICATE OF ANALYSIS

Client:

Metco Environmental  
16115 Dooley Road  
Dallas, TX 75244

Attn: Hanoch Toren

Work Order #: 96-02-151  
Client Code: METCO  
Report Date: 03/04/96  
Work ID: Dust for reanalysis  
Date Received: 02/08/96

Purchase Order: Chapparal Steel/96-15

SAMPLE IDENTIFICATION

Lab Number	Sample Description	Lab Number	Sample Description
01	B Baghouse Dust		

Data are reported on an as-received basis unless stated otherwise. Estimated Quantitation Limits (EQL's) are listed for most analytes. EQL's are the lowest concentrations that can be reliably measured under routine laboratory conditions. Unless otherwise noted, method blanks had no targets found above their EQL's and results were not corrected for blanks.

Certificate approved by  
Carol L. Turner

**000002**

Work Order # 96-02-151

Ross Analytical Services, Inc

Reported: 03/04/96

**REPORT COMMENTS**

Target hits were found for arsenic and antimony but these results were below the reported EQL and reported as <EQL on the results page. The results for these metals are summarized below and flagged with a "B":

Metal	Lab No.	Result (mg/Kg)	EQL (mg/Kg)
Antimony	01	55.7 B	500
Arsenic	01	108 B	500

A duplicate of this sample was analyzed. Results are summarized below:

Metal	Result (mg/Kg)
Antimony	60.0 B
Arsenic	93.3 B
Cadmium	544
Chromium	882
Copper	1510
Iron	134,000
Lead	17,900
Manganese	19,000
Molybdenum	35.7 B
Nickel	285
Zinc	126,000

**Laboratory Control Sample**

Metal	% Recovery
Antimony	131
Arsenic	111
Cadmium	110
Chromium	108
Copper	120
Iron	79
Manganese	99
Molybdenum	116
Nickel	109
Zinc	107

**000004**

ork Order # 96-02-151

Ross Analytical Services, Inc

Reported: 03/04/96

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ample Description: B Baghouse Dust

Lab No.: 01

<u>analyte Description</u>	<u>Result</u>	<u>Units</u>	<u>EOL</u>
ntimony by ICP	<EQL	ng/Kg	500
rsenic by ICP	<EQL	ng/Kg	500
admium by ICP	556	ng/Kg	25
hromium by ICP	861	ng/Kg	50
pper by ICP	1530	ng/Kg	100
ron by ICP	133,000	ng/Kg	1000
ead by ICP	18,200	ng/Kg	250
anganese by ICP	19,500	ng/Kg	25
olybdenum by ICP	48	ng/Kg	50
ickel by ICP	287	ng/Kg	100
inc by ICP	128,000	ng/Kg	100